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 DWIGHT L. DOVE

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

DWIGHT DOVE,

Plaintiff,

v.

BAYER HEALTHCARE, Biological Products  
 Division, a for profit business entity,

Defendant.

CASE NO. C-05-02873 JSW

**STIPULATION AND *[PROPOSED]*  
 ORDER REGARDING DISPOSITIVE  
 MOTION SCHEDULE**

Judge: Honorable Jeffrey S. White

Trial Date: None Set.

WHEREAS, plaintiff's opposition to defendant's motion for summary judgment is currently due March 17, 2006;

WHEREAS, defendant's reply thereto is currently due on March 24, 2006;

WHEREAS, the hearing for the motion for summary judgment is currently set for April 7, 2006;

WHEREAS, on March 7, 2006 this Court ordered defendant to turn over personnel files in response to plaintiff's 2<sup>nd</sup> Request for Production of Documents;

WHEREAS, defendant is working to determine the identity of the employees, both current and former, whose personnel files are responsive to the Request;

WHEREAS, once the relevant employees are identified, defendant will need to retrieve many of the responsive personnel files from a storage vendor;

WHEREAS, defendant estimates that with its best efforts, it will be able to produce such files to plaintiff by Friday, March 24, 2006;

WHEREAS, this will leave plaintiff without the opportunity to have such files prior to submitting its opposition to defendant's motion for summary judgment;

WHEREAS, plaintiff, on the one hand, and Bayer, on the other hand, are collectively adverse, they agree through their respective counsel and stipulate as follows:

1. Plaintiff's opposition will now be due April 7, 2006; and
2. Defendant's reply thereto will now be due April 14, 2006; and
3. The hearing on the dispositive motion(s) will now take place on May 5, 2006.

**IT IS SO STIPULATED.**

DATED: March 8, 2006

MOORE & MOORE

By: s/Howard Moore, Jr.  
HOWARD MOORE, JR.  
Attorney for Plaintiff  
DWIGHT L. DOVE

DATED: March 8, 2006

By: s/Charles Stephen Ralston  
CHARLES STEPHEN RALSTON  
Attorney for Plaintiff  
DWIGHT DOVE

DATED: March 8, 2006

THE LOUDERBACK LAW FIRM



By: s/Stephen K. Robinson  
JEROME SCHREIBSTEIN  
JAMES T. CONLEY  
STEPHEN K. ROBINSON  
Attorneys for Defendant  
BAYER HEALTHCARE LLC

1 **IT IS SO ORDERED.**

2  
3 Dated: \_\_\_\_\_, 2006

4 \_\_\_\_\_  
5 Honorable Jeffrey S. White  
6 UNITED STATES DISTRICT JUDGE  
7 NORTHERN DISTRICT OF CALIFORNIA

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